

MJL:BTR
F.#2003R001447

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

- - - - -x

UNITED STATES OF AMERICA

-against-

JAMES W. ZIMBLER,

Defendant.

- - - - -x

THE UNITED STATES ATTORNEY CHARGES:

COUNT ONE

(Conspiracy to Launder Money)

1. On or about and between June 9, 1995 and October 24, 2002, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendant JAMES W. ZIMBLER, together with others, did knowingly and intentionally conspire to conduct financial transactions affecting interstate commerce, which in fact involved proceeds of specified unlawful activity, to wit: securities fraud, in violation of Title 15, United States Code, Section 78j(b) and Rule 10b-5 (Title 17, Code of Federal Regulations, Section 240.10b-5) of the rules and regulations of the Securities and Exchange Commission, and mail fraud, in violation of Title 18, United States Code, Section 1341, knowing that the property involved in the financial

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LONG ISLAND OFFICE

I N F O R M A T I O N

Cr. No. _____
(T. 18, U.S.C., §§ 982,
1956(h) and 3551 et seq.)

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LINDSAY, M.

transactions represented the proceeds of some form of unlawful activity (a) with the intent to promote the carrying on of said specified unlawful activity, in violation of Title 18, United States Code, Section 1956(a)(1)(A)(i), and (b) knowing that the transactions were designed in whole and in part to conceal and disguise the nature, location, source, ownership and control of the proceeds of the specified unlawful activity, in violation of Title 18, United States Code, Section 1956(a)(1)(B)(i).

(Title 18, United States Code, Sections 1956(h) and 3551 et seq.)

CRIMINAL FORFEITURE ALLEGATION

2. The United States hereby gives notice to the defendant that upon his conviction of the offense charged in Count One the government will seek forfeiture in accordance with Title 18, United States Code, Section 982, of all property involved in the offense in violation of Title 18, United States Code, Section 1956, or conspiracy to commit such offense, and all property traceable to such property as a result of the conviction of Count One, including, but not limited to, \$12,000,000 in United States currency.

3. If any of the above-described forfeitable property, as a result of any act or omission of the defendant:

a. cannot be located upon the exercise of due

diligence;

- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property, which cannot be divided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendant up to the value of the forfeitable property described in this forfeiture allegation.

(Title 18, United States Code, Section 982)



ROSLYNN R. MAUSKOPF
UNITED STATES ATTORNEY
EASTERN DISTRICT OF NEW YORK

SIR:

PLEASE TAKE NOTICE that the within will be presented for settlement and signature to the Clerk of the United States District Court in his office at the U.S. Courthouse, 610 Federal Plaza, Central Islip, New York, on the ___ day of ___, 20___, at 10:30 o'clock in the forenoon.

Dated: Central Islip, New York

20___

United States Attorney,
Attorney for

To:

Attorney for

Slip

PLEASE TAKE NOTICE that the within is a true copy of ___ duly entered herein on the ___ day of ___,

in the office of the Clerk of the Eastern District of New York,

Dated: Central Islip, New York

20___

United States Attorney,
Attorney for

To:

Attorney for

Criminal Action No.

**UNITED STATES DISTRICT COURT
Eastern District of New York**

UNITED STATES OF AMERICA

- against-

JAMES W. ZIMBLER,

Defendants.

INFORMATION

ROSLYNN R. MAUSKOPF

United States Attorney
Eastern District of New York
United States Courthouse
610 Federal Plaza
Central Islip, New York 11722

Due Service of a copy of the within

is hereby admitted.

Dated: ___, 20___

Attorney for

BURTON T. RYAN, JR., AUSA
Assistant U.S. Attorney (631) 715-7853